

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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**MAY 1 1995**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

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In the Matter of )  
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Amendment of Subpart D of Part 68  
of the Commission's Rules and  
Regulations )  
)  
\_\_\_\_\_

RM-8621

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**COMMENTS OF THE INDEPENDENT DATA  
COMMUNICATIONS MANUFACTURERS ASSOCIATION**

The Independent Data Communications Manufacturers Association, Inc. ("IDCMA"), by its attorneys, hereby responds to the Commission's request for comment on the above-captioned petition for rulemaking filed by the Telecommunications Industry Association ("TIA").<sup>1</sup> The petition seeks amendments to Part 68 of the Commission's rules in order to harmonize United States equipment registration procedures with Canadian equipment certification procedures.<sup>2</sup> The purpose of the harmonization is to facilitate trade in telecommunications equipment between the United States and Canada, in accord with the goals of the North American Free Trade Agreement ("NAFTA").

<sup>1</sup> See "Pleading Cycle Established for Comments on TIA's Petition for Rulemaking to Amend Part 68, Subpart D," FCC Public Notice, DA 95-618 (released Mar. 27, 1995).

<sup>2</sup> See Petition for Rulemaking of the Telecommunications Industry Association, RM-8621 (filed Mar. 9, 1995).

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IDCMA is a trade association comprised of major manufacturers of equipment used to effectuate and to manage data communications. Among the devices marketed by IDCMA member companies are terminal equipment such as modems, digital data sets, multiplexers, network management systems and many other related products. IDCMA has been significantly involved in proceedings concerning the Commission's Part 68 rules and regulations. When the Commission first established the registration program,<sup>3</sup> the technical specifications were based in large measure on a record developed by IDCMA. In subsequent years, IDCMA has continued to play an active role in consideration of proposals to extend the registration program to cover equipment connection to additional services, including digital data services and ISDN.<sup>4</sup>

The time has now come to adapt the Part 68 registration program to harmonize United States and Canadian registration/certification requirements. This will permit terminal equipment to be designed and manufactured to the harmonized technical requirements. Additionally, the equipment will have to be tested only once for compliance with the harmonized requirements to obtain registration in the United States and certification in Canada, shortening time to market and reducing costs. Consumers will benefit from lower

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<sup>3</sup> See Proposals for New or Revised Classes of Interstate and Foreign Message Toll Telephone Service (MTS) and Wide Area Telephone Service (WATS), First Report and Order (Docket No. 19528), 56 F.C.C.2d 593 (1975) (subsequent history omitted).

<sup>4</sup> See Petitions Seeking Amendments of Part 68, 94 F.C.C.2d 5, 22 (1983), reconsideration denied, FCC 84-145 (April 27, 1984) (network channel terminating equipment ("NCTE") at customer's premises must be unbundled and provided on a competitive basis; principle applies to all present and future digital services, circuits, and facilities); Integrated Services Digital Networks, 98 F.C.C.2d 249, 261 (1984) (extended to ISDN).

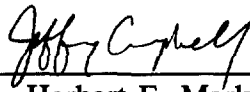
equipment costs due to the effect of larger production scales and increased competition. The United States economy will benefit from increased opportunities to export sophisticated equipment that will support additional high-wage jobs domestically. Lastly, the harmonization will encourage Mexico and other countries to develop harmonized requirements which will increase the possibility of free trade in telecommunications equipment. IDCMA believes that these benefits can be achieved while maintaining the integrity of the Part 68 registration program.

The relevant Canadian authorities have begun the process of changing Canadian regulations, harmonizing them with the Commission's regulations. It is anticipated that the harmonized Canadian regulations will be in force in the near future. Fast approval of the changes proposed by TIA would complete this phase of the harmonization process.

For all of the foregoing reasons, IDCMA urges the Commission to institute an expedited rulemaking proceeding to implement the changes proposed in TIA's petition for rulemaking.

Respectfully submitted,

INDEPENDENT DATA COMMUNICATIONS  
MANUFACTURERS ASSOCIATION, INC.

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